

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,	*
Complainant,	*
vs.	* CASE NUMBER 2:07-CR-00285-MHT-TFM
TOMMY JORDAN	*
Defendant.	*

DEFENDANT'S MOTION FOR ADDITIONAL DISCOVERY
(Tax returns of government witnesses)

COMES NOW the Defendant, Tommy Jordan, through his counsel of record, and moves under Rule 16(a)(1)(C) of the Federal Rules of Criminal Procedure that the U.S. government be ordered to allow defense inspection and reproduction of the income tax returns for the tax years 2001, 2002, and 2003 of the witnesses named in the indictment of Mr. Jordan.

Such information is important for the defense and may contain exculpatory evidence. The defense believes the government's theory of the case is that Mr. Jordan persuaded or duped innocent tax payers into filing fabricated or overstated returns. If their previous returns show that these taxpayers had filed similar returns in previous years, this may be evidence that the taxpayers, and not Mr. Jordan, were at fault in the filing of such questioned returns.

Respectfully submitted,

s/Everett M. Urech
EVERETT M. URECH
AL BAR NO.: ASB-6693-E44E

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have this date delivered a copy of the foregoing to the Mr. Andrew Shiff, Assistant United States Attorney, Middle District of Alabama, by electronically filing, this the 30th day of June, 2008.

s/Everett M. Urech

EVERETT M. URECH